

**REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-26 in the application. In response to an election requirement, the Applicants provisionally selected Claims 1-7 without traverse and withdrew Claims 8-26. The Applicants also amended Claims 1-3 in a previous response.

In the present response, the Applicants have amended dependent Claim 3 to more clearly point out what is claimed. No other claims have been amended, canceled or added. Accordingly, Claims 1-7 are currently pending in the application.

**I. Formal Matters and Objections**

The Examiner has objected to the drawings for failing to specifically point out what is claimed. In response, the Applicants have amended Claim 3 to more clearly indicate that the centralized connector module provides a common terminating point employing the interconnected terminal sets for components during normal operation of the components. Support for amended Claim 3 is provided in Figures 1 and 2 and paragraphs 7 and 22 of the original specification. Figure 1 illustrates an embodiment of a block diagram of a refrigeration unit 100 including a centralized connector module 160. As illustrated, various components of the refrigeration unit 100 (*i.e.*, the compressor 120, the fan 140 and the control circuitry 150) are connected to the centralized connector module 160. Figure 2 provides an embodiment of a block diagram of a centralized connector module 200 including multiple terminal sets representing various components of a refrigeration unit. These components can be terminated at the centralized connector module 200 employing the multiple terminal sets (*i.e.*, terminal set 21 for the compressor module input). Thus, Figures 1

and 2 clearly illustrate a centralized connector module configured to provide a common terminating point for components during normal operation thereof employing interconnected terminal sets as recited in amended dependent Claim 3. The Applicants, therefore, respectfully request the Examiner to withdraw the objection to the drawings.

## II. Rejection of Claims 1, 3 and 7 under 35 U.S.C. §102

The Examiner has rejected Claims 1, 3 and 7 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,124,716 to Kanamori. The Applicants respectfully disagree since Kanamori does not teach a centralized connector module including a dielectric body having interconnected terminal sets corresponding to components connectable thereacross as recited in independent Claim 1.

Kanamori relates to electrical continuity testing equipment and checking the continuity of electrical devices connected to a junction block by wiring harnesses. (See column 1, lines 4-9.) Kanamori discloses an electrical junction block 10 having a pair of ports to receive a wiring harness connector 18 and a test unit connector 20. (See column 2, line 66 to column 3, line 3.) The test unit connector 20 includes a body 34 from which a plurality of terminal pins 36 extends. The terminal pins 36 are electrically connected to wires 38 extending to a test unit 26. (See column 3, lines 33-35.)

The terminal pins 36, however, are not interconnected terminal sets corresponding to components connectable thereacross as asserted by the Examiner. (See Examiner's Final Rejection, page 3.) On the contrary, electrical devices 24 connected to the wiring harness 18 are terminated at

the wiring harness 18. (See column 3, lines 3-5.) Instead of a terminal set, the terminal pins 36 are individual protrusions that provide a connection between a test unit 26 and electrical devices 24 that are operatively connected to the junction block 10 via the wiring harness connector 18. (See column 3, lines 48-61; column 4, lines 11-16 and Figures 1-2.) Accordingly, the terminal pins 36 do not provide termination for devices and do not correspond to components connected thereacross. As such, the terminal pins 36 do not teach interconnected terminal sets corresponding to components connectable thereacross as recited in independent Claim 1.

Furthermore, the Applicants do not find any other teachings in Kanamori that disclose a centralized connector module including a dielectric body having interconnected terminal sets corresponding to components connectable thereacross and continuity indicator circuits associated with at least some of the terminal sets and configured to indicate continuity faults with respect to connected ones of the components as recited in independent Claim 1. Instead, Kanamori teaches one body (wiring harness connector 18) that provides a termination for electrical devices and a separate tester (test unit 26) that checks electrical continuity for the electrical devices. (See column 4, lines 11-16 and Figure 1.)

Since Kanamori does not teach each and every element of independent Claim 1, Kanamori does not anticipate Claim 1 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1, 3 and 7 and allow issuance thereof.

**III. Rejection of Claims 2, 4 and 6 under 35 U.S.C. §103**

The Examiner has rejected Claims 2, 4 and 6 under 35 U.S.C. §103(a) as being unpatentable over Kanamori in view of U.S. Patent No. 3,728,616 to Cheek, *et al.* The Applicants respectfully disagree.

As discussed above, Kanamori does not teach a centralized connector module as recited in independent Claim 1. Additionally, Kanamori does not suggest each element of independent Claim 1 since Kanamori discloses a wiring harness connector 18 that is used to terminate electrical devices but does not include continuity indicator circuits. Instead, as discussed above, Kanamori teaches the continuity checking is performed by the tester, not circuits within the wiring harness connector 18. Accordingly, Kanamori does not teach or suggest each element of independent Claim 1.

Cheek has not been cited to cure the deficiencies of Kanamori but to teach the subject matter of dependent Claims 2, 4 and 6. Additionally, Cheek does not cure the deficiencies of Kanamori since Cheek teaches an apparatus for testing the continuity and erroneous connections of a plurality of wired connections. (See column 1, lines 30-32.) Thus, instead of disclosing a central connector module including continuity circuits, Cheek teaches a separate device that is used to check continuity of circuits. Cheek, therefore, does not cure the deficiencies of Kanamori.

As such, Kanamori and Cheek, individually or in combination, does not teach or suggest each and every element of independent Claim 1 and Claims dependent thereon. Thus, the cited combination of Kanamori and Cheek does not provide a *prima facie* case of obviousness of independent Claim 1 and Claims 2, 4 and 6 which depend thereon. The cited combination,

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therefore, does not render obvious Claims 2, 4 and 6. Accordingly, the Applicants respectfully request the Examiner to withdraw §103(a) rejection of Claims 2, 4 and 6 and allow issuance thereof.

**IV. Rejection of Claims 2, 4 and 6 under 35 U.S.C. §103**

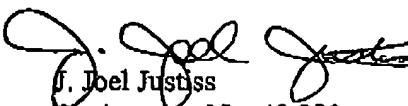
Support for amended Claim 3 can be found in paragraphs 7 and 22 and Figures 1-2 of the original specification.

**V. Conclusion**

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-7.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,  
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